
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 16-32728
Chadell Tribett)	
)	Chapter 13
)	
Debtor(s).)	Judge Timothy A. Barnes

NOTICE OF MOTION

TO: Chadell Tribett, 9147 S Woodlawn Ave. Chicago, IL 60619 *via US mail*

Internal Revenue Service, P.O. Box 7346 Philadelphia PA 19101-7346 *via US mail*

Department of the Treasury, Internal Revenue Service, Kansas City, MO 64999-0025 *via US mail*

Trustee Marilyn O Marshall, 224 South Michigan Ste. 800, Chicago, IL 60604 *via ECF clerk's electronic delivery system*

U.S. Trustee, 219 S. Dearborn Suite 873, Chicago IL 60604 *via ECF clerk's electronic delivery system*

See attached service list

PLEASE TAKE NOTICE that on **November 8, 2018 at 9:30 a.m.**, I shall appear before the Honorable Judge Timothy A. Barnes at the Federal Courthouse, 219 S. Dearborn, Courtroom 744, Chicago, Illinois 60604, or any judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on October 18, 2018 before the hour of 7:00 p.m.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s)
Cutler & Associates, Ltd.
4131 Main St, Skokie, IL 60076
Phone: (847) 673-8600

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 16-32728
Chadell Tribett)	
)	Chapter 13
)	
Debtor(s).)	Judge Timothy A. Barnes

Motion to Extend Time for Debtor to File Claim on behalf of Creditor

Now comes, Chadell Tribett (hereinafter referred to as “Debtor”), by and through her attorneys, The Law Offices of Cutler & Associates, Ltd., and moves this Honorable Court for entry of an Order Extending time for Debtor to file claim on behalf of Creditor, and in support thereof, respectfully represents as follows:

1. On October 13, 2016 the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on January 5, 2017. The confirmed plan provided for monthly payments of \$220 for 36 months with unsecured creditors receiving a minimum of 9% of their claims.
3. The Debtor’s plan was modified on September 28, 2017 to defer the unpaid tax refund for 2016 to the end of the debtor’s plan.
4. The Debtor owes the Internal Revenue Service for tax year 2015. The Debtor has provided her counsel with information regarding the 2015 tax debt and the total amount owed is \$7,810.32.
5. The last date to file governmental claims in the instant case was April 11, 2017.
6. The Debtor mistakenly forgot to include the above-mentioned debt in the original plan at the time of filing and the deadline to file a governmental proof of claim has passed. Allowing the debt to Internal Revenue Service to be paid through the bankruptcy would be

beneficial to the debtor since the debtor is unable to come up with the lump sum amount and is seeking to spread the amount owed to the Internal Revenue Service over the remaining months of her Chapter 13 repayment plan as it would be a hardship for the debtor to come up with the full amount outside of the Bankruptcy.

7. That the Debtor has filed in good faith and intends to complete the Chapter 13 plan of reorganization.

8. The Debtor respectfully requests that her counsel be granted fourteen (14) days from the date the order on this motion is entered to file an unsecured priority claim on behalf of Internal Revenue Service for the above-referenced debt.

WHEREFORE, Debtor prays that this Honorable Court enter an Order for the following relief:

1. Extending time for Debtor's counsel to file an unsecured priority claim on behalf of the Internal Revenue Service within fourteen (14) days from the date the order on this motion is entered; and
2. For any and all other relief this Court deems fair and proper.

Dated: October 18, 2018

Respectfully Submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St. Skokie, IL 60076
Phone: (847) 673-8600